

May 11, 2020

Kathy A. Surraat - States
KATHY A. SURRAAT-STATES
Chief United States Bankruptcy JudgeUNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION
RECEIVED + FILED
2020 MAY 11 AM 10:54CLERK, US BANKRUPTCY COURT
EASTERN DISTRICT
ST LOUIS, MISSOURI-MR

In re:) Chapter 11
)
)
FORESIGHT ENERGY LP, *et al.*,) Case No. 20-41308-659
)
)
)
Debtors.)

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

Pursuant to LR 2090B(1) of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the local rules of the United States District Court for the Eastern District of Missouri, I, Earle I. Erman move to be admitted pro hac vice to the bar of this Court for the purpose of representing the creditors listed on Exhibit A attached hereto. In support of this motion, I submit the following information as required by Rule 12.01(F):

- a. *Full name of the movant-attorney:*
Earle I. Erman
- b. *Address and telephone number of the movant-attorney:*
Maddin, Hauser, Roth & Heller, P.C.
28400 Northwestern Highway, 2nd Floor
Southfield, MI 48034
(248) 208-0710
- c. *Name of the firm or letterhead under which the movant practices:*
Maddin, Hauser, Roth & Heller, P.C.
- d. *Name of the law school movant attended and the date of graduation therefrom:*
Wayne State University Law School – 1974
- e. *State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any:*
State Bar of Michigan, admitted 1974
U.S. District Court, Eastern and Western Districts of Michigan
U.S. Court of Appeals, Fifth and Sixth Circuit

- f. *Statement that the movant is a member in good standing of all bars of which movant is a member and that movant is not under suspension or disbarment from any bar:*


Movant is a member in good standing of all bars of which Movant is a member and is not currently under suspension or disbarment from any bar.

- g. *Statement that the movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District:*

Movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that Movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

MADDIN, HAUSER, ROTH & HELLER, P.C.

By: 
Earle I. Erman (P24296)
28400 Northwestern Hwy., 2nd Floor
Southfield, MI 48034
(248) 354-4030
eerman@maddinhauser.com

DATED: May 8, 2020

Counsel for:
Nora B. Kavner, individually
Nora B. Kavner as Trustee of the Nora
Kavner Family Trust uad 04/14/09, as
Trustee of The DK-NK Irrevocable Trust, as
Owner and Beneficiary of the IRA fbo Nora
B. Kavner Pershing LLC as Custodian
Nora B. Kavner, as Trustee of The Nora
Kavner Family Trust uad 04/14/09
Nora B. Kavner, as Trustee of The DK-NK
Trust uad 11/29/12
Hannah Geller, individually
Benjamin Geller, individually

EXHIBIT A

Parties being represented by Earle I. Erman of Maddin, Hauser, Roth & Heller, P.C.:

1. Nora B. Kavner, individually
2. Nora B. Kavner as Trustee of the Nora Kavner Family Trust uad 04/14/09,
as Trustee of The DK-NK Irrevocable Trust, as Owner and Beneficiary of
the IRA fbo Nora B. Kavner Pershing LLC as Custodian
3. Nora B. Kavner, as Trustee of The Nora Kavner Family Trust uad 04/14/09
4. Nora B. Kavner, as Trustee of The DK-NK Trust uad 11/29/12
5. Hannah Geller, individually
6. Benjamin Geller, individually

CERTIFICATE OF SERVICE

The undersigned states that on May 8, 2020, she served a copy of the Verified Motion for Admission Pro Hac Vice via e-mail on the following parties:

Paul M. Basta
Paul, Weis, Rifkin, Wharton & Garrison
pbasta@paulweiss.com

David William Gaffey
Whiteford Taylor & Preston, LLP
dgaffey@wtplaw.com

Office of the U.S. Trustee
carole.ryczek@usdoj.gov

/s/ Grace Safko
Grace Safko

Dated: May 8, 2020